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Attorneys for Mike Albert Ltd.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

NGV GLOBAL GROUP, INC., ET AL.,

Debtors

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Case No. 22-42780-MXM11

Chapter 11

(Jointly Administered)

**MIKE ALBERT LTD.'s REQUEST FOR EXPEDITED SETTING ON ITS RENEWED
MOTION TO HOLD DEBTORS AND FARROUKH ZAIDI IN CONTEMPT**

Mike Albert Ltd. ("MAL") files this Request for Expedited Setting on Its Renewed Motion to Hold Debtors and Farroukh Zaidi in Contempt ("Request") to request the Court set the Motion of Mike Albert Ltd. to Hold Debtors and Farroukh Zaidi in Contempt [Doc 204] ("Motion") on an expedited basis and in support thereof would respectfully show as follows:

1. MAL filed the Motion March 8, 2023 to request an Order from the Court holding Debtors and Farroukh Zaidi in contempt for violating the Court's order entered January 27, 2023 [Doc 151 and Doc 152] and ordering Debtors to immediately return MAL's vehicles ("Vehicles") to the location previously designated by MAL; pay the attorneys' fees of MAL in connection with the Motion and the underlying Motion to Sequester Vehicles; pay all costs and expenses incurred by MAL in obtaining the Retained Vehicles Debtors have failed to return to MAL pursuant to the

duly entered Order of this Court; pay a daily rental fee of \$133 per day for all Class 8 Vehicles and \$153 per day for all Class 6 Vehicles to MAL beginning March 1 and continuing until the Retained Vehicles are returned to or recovered by MAL; and other sanctions deemed appropriate by the Court.

2. Counsel for MAL filed a Certificate of Breach of Agreed Order regarding the Vehicles on February 16, 2023 and again on March 1, 2023, effectively lifting the stay as to all of the MAL Vehicles, and thereafter made demand on Debtors to cease use of all of the MAL Vehicles and return them to a location designated by MAL, but thus far Debtors have failed to comply with this request.

3. Debtors' breach of the Agreed Order are more specifically detailed in the Motion, but arise out of failure to pay MAL the Retained Vehicles or, failing such payment, to return all Retained Vehicles to a location designated by MAL.

4. This is the third time MAL has been forced to seek redress through this Court for Debtors' failure to comply with the express terms of a duly entered order of this Court, and said failures have and continue to impact MAL's rights to its property and every day Debtors' contempt of such orders continues further prejudices the rights of MAL.

5. The ongoing risk to MAL and its property as a result of Debtors' breach of the Agreed Order is substantial and has not been resolved through the efforts of the parties or their counsel; MAL would therefore request the Court set its Motion for hearing on an expedited basis to ensure a prompt resolution to the matters presented.

Dated: March 13, 2023

Respectfully submitted,

/s/ Patrick M. Lynch
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Attorneys for Mike Albert Ltd.

CERTIFICATE OF SERVICE

A true and correct copy of Mike Albert's Request for an Expedited Setting on its Renewed Motion to Hold Debtors and Farroukh Zaidi in Contempt was served upon the parties listed below by First Class Mail, postage prepaid, or by electronic filing notification, on March 13, 2023.

U.S. Trustee
1100 Commerce Street, Room 976
Dallas, TX 75202

Emily S. Chou, Esq.
Lynda L. Lankford, Esq.
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Attached Service List

/s/ Patrick M. Lynch

Patrick M. Lynch

CERTIFICATE OF CONFERENCE

The undersigned counsel for Mike Albert Ltd. hereby certifies that counsel for Mike Albert Ltd. and counsel for Debtors have had multiple emails and discussions regarding the issues presented in the Motion and the need for an expedited setting and they will work together with the Court to find a mutually agreeable setting to hear Mike Albert's Motion.

/s/ Patrick M. Lynch

Patrick M. Lynch